

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) Cr. No. 05-00252 DAE
)
vs.) 18 USC 2252A
)
DAWE GLOVER,)
) DECLARATION OF SAMUEL P. KING, JR.;
Defendant.) EXHIBITS A-C
)

DECLARATION OF SAMUEL P. KING, JR.

I, SAMUEL P. KING, JR., declare and say:

This Court previously extended Defendant's surrender date to May 12, 2008, because Defendant had to have open chest surgery. The surgery was completed successfully, and the mass that was growing near Defendant's heart was removed (see Exhibit C - photograph of Defendant's chest post-surgery). Letters from Defendant's treating physicians are attached hereto as Exhibits A & B.

The letter from Dr. Tan (Ex. A) has Graves and Hashimoto diseases which affect his thyroid.

The letter from Dr. Ramiscal (Ex. B) notes that a CT scan is scheduled for mid-July to check for growth on the four right lung nodules seen in the January 2008 preoperative chest CT scan. The problem here is that these nodules may be cancerous. This can be determined if they show growth in the CT scan. If there is growth, a needle biopsy will be performed to confirm the diagnosis. Defendant's mother recently had the same condition and a portion of her lung had to be removed.

It seems prudent at this point to allow Defendant's doctors at Defendant's and his insurance company's expense to undertake the determination of whether Defendant has and will need to be treated for cancer and what such treatment will involve before Defendant's incarceration begins.

Otherwise, the expense will have to be born by the Government. It appears that the delay would only be to mid-July. If Defendant does have lung cancer, then we obviously have a serious problem.

Defendant respectfully requests a short further extension for 90 days to allow his doctors to assess the possible cancer situation and determine what treatment will need to be done if cancer is present.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED: Honolulu, Hawaii, April 18, 2008.

A handwritten signature in black ink, appearing to read 'S. King, Jr.', is positioned above a horizontal line.

SAMUEL P. KING, JR.
Attorney for Defendant